

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

CELLCO PARTNERSHIP d/b/a VERIZON
WIRELESS and VERIZON CORPORATE
SERVICES GROUP, INC.,

Defendants.

Case No. 2:23-cv-00352-JRG-RSP

JURY TRIAL DEMANDED

**PLAINTIFF HEADWATER RESEARCH LLC'S UNOPPOSED MOTION TO
EXPEDITE BRIEFING ON HEADWATER'S MOTION TO
DISQUALIFY WILMER CUTLER PICKERING HALE & DORR**

Plaintiff Headwater Research LLC (“Headwater”) respectfully moves to expedite briefing on its concurrently filed Motion to Disqualify Wilmer Cutler Pickering Hale & Dorr (“Motion to Disqualify”). Defendants do not oppose this motion to expedite briefing but do oppose the Motion to Disqualify.

On June 16, 2025, one week before the trial of this matter was set to begin, two lawyers from WilmerHale entered appearances as counsel for Defendants in this matter. Dkt. #s 326 and 327. Headwater promptly contacted Defendants about this to raise its concerns about conflicts. Headwater also raised its concerns with the Court during the June 18, 2025 pretrial conference, and the Court recognized that expedited briefing would be appropriate given the impending trial in this matter. *See* 6/18/2025 PTC3 Tr. at 6:3-13, 71:3-73:18. While trial did not take place on June 23, this remains a highly time-sensitive issue because trial is scheduled to begin July 17, 2025.

Headwater respectfully seeks expedited briefing on its concurrently filed Motion to Disqualify, and Defendants have agreed to the briefing schedule proposed by Headwater. Accordingly, Headwater respectfully requests—and Defendants do not oppose—that the Court enter an Order shortening the briefing schedule as follows:

1. Defendants’ opposition to Headwater’s Motion to Reconsider is due on or before July 14, 2025.
2. No further briefing is permitted.

Dated: July 9, 2025

Respectfully submitted,

/s/ Brian Ledahl

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*Attorneys for Plaintiff,
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on July 9, 2025.

/s/ Brian Ledahl
Brian Ledahl

CERTIFICATE OF CONFERENCE

Counsel for Headwater conferred with counsel for Defendants on July 8 and 9, 2025 on this Motion to Expedite Briefing. Defendants do not oppose this motion.

/s/ Brian Ledahl
Brian Ledahl